



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: January 21, 1988
TO: All Permit Processing Engineers
FROM: William J. Dennison, Director of Engineering /s/ WJD
SUBJECT: Water Scrubbers as Control Equipment for Reactive Organic Volatile Organic Compounds

Water scrubbers have been proposed as control equipment for water-soluble volatile organic compounds (VOC). However, the VOCs absorbed by these scrubbers and discharged into the waste water can still be emitted in the waste water treatment system, the sewer lines and the sewage treatment plant. Therefore, the use of water scrubbers as the sole means for control of VOCs will not guarantee a reduction of these emissions into the atmosphere.

Water scrubbers, by themselves, should not be considered air pollution control equipment nor BACT candidates for control of VOCs unless the VOCs in the waste water are subsequently destroyed or disposed of in such a manner as to ensure that they are not released into the atmosphere of the District.

MAC:bdp